

EXHIBIT Q

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEVE SANDS

Plaintiff,

- against -

CBS INTERACTIVE INC.

Defendant.

Case No. 1:18-cv-7345 (JSR)

PLAINTIFF’S RULE 26(e) SUPPLEMENTAL DISCLOSURES

Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, plaintiff Steve Sands (“Plaintiff”) hereby provides the following Supplemental Disclosures.

These disclosures are based on information reasonably available to Plaintiff at this time, and Plaintiff does not represent that he is identifying every document, tangible thing, or individual potentially relevant to this lawsuit. Plaintiff continues to investigate the claims in this action, and reserves the right to produce during discovery or at trial such data, information, or documents as are subsequently discovered, generated, determined to be relevant, or determined to have been omitted from these disclosures. Plaintiff also reserves the right to modify or supplement any or all of these disclosures.

Identity of Individuals Likely to Have Discoverable Information

The following persons are reasonably likely to have discoverable information that Plaintiff may use to support his claims in the above-captioned action.

<u>Name</u>	<u>Company Affiliation/Address</u>	<u>Expected Areas of Knowledge</u>
Steve Sands	Contact through Plaintiff's counsel: Liebowitz Law Firm 11 Sunrise Plaza - Suite 305 Valley Stream, NY 11580	<ul style="list-style-type: none"> Knowledge regarding the creation and licensing of copyrighted works at issue.
Donna Halperin	Contact through Plaintiff's counsel: Liebowitz Law Firm 11 Sunrise Plaza - Suite 305 Valley Stream, NY 11580	<ul style="list-style-type: none"> Knowledge regarding registration of the copyrighted works at issue.
Getty Images / Wire Image	www.gettyimages.com Veronica Langridge Senior Claims Specialist p: +14033986839 veronica.langridge@gettyimages.com	<ul style="list-style-type: none"> Knowledge regarding licensing of the copyrighted works at issue
First Look Instant Celebrity Photos	www.twitter.com/getfirstlook Beyond domain name, contact information is unknown; appears to be defunct.	<ul style="list-style-type: none"> Knowledge regarding publication of one of the copyrighted works at issue (content title: "Bernthal Woll 10516 (12).jpg")

Documents and Things in the Possession of Counsel or the Parties

Plaintiff identifies the following categories of documents and things in his possession, custody or control that may be used to support his claims:

- Photographs at issue.
- Licensing fee history of copyrighted works.
- Benchmark licensing fee history of other photographs taken by Sands.
- The U.S. Copyright Registration information of the copyrighted works.

Statement of Basis for Damages

Plaintiff refers Defendant to the Complaint for an itemization of the types of damages suffered. As Plaintiff has not yet obtained discovery of Defendant's financial, sales and other relevant records, Plaintiff cannot make a reasonable estimate of the damages sustained or infringing profits he may recover as a result of Defendant's actions.

Plaintiff is entitled to statutory damages up to \$150,000 for Defendant's willful infringement of each Photograph which qualifies for statutory damages. *See* 17 U.S.C. § 504(c).

Plaintiff may also recover actual damages for the copyright infringement claim that takes into account any lost licensing fees, diminution of the value of the copyright, and any other benefit or advantage gained by Defendant as a result of the infringement. *See* 17 U.S.C. §504(b).

Insurance Agreements in Force

Not applicable.

Identities of Experts and Their Opinions

At this time, Plaintiff has not yet retained an expert or experts, but reserves his rights to do so as discovery progresses.

Dated: Valley Stream, New York
December 5, 2018

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Attorneys for CBS Interactive Inc.

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true and correct copy of the foregoing PLAINTIFF'S INITIAL DISCLOSURES has been served via e-mail and first-class mail on September 28, 2018 to counsel listed below.

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Dated: September 28, 2018

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